



21st Floor  
1251 Avenue of the Americas  
New York, NY 10020-1104

**Katherine Bolger**  
(212) 402-4068 tel  
(212) 489-8340 fax

katebolger@dwt.com

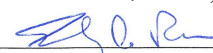
## MEMO ENDORSED

October 13, 2022

### VIA ECF

The Honorable Edgardo Ramos  
Thurgood Marshall United States Courthouse  
40 Foley Square  
Courtroom 619  
New York, NY 10007

Defendants' request for an initial, 30-day, extension of time to answer or respond to the Second Amended Complaint (from October 19, 2022, to November 18, 2022) is granted. So ordered.

  
Edgardo Ramos, U.S.D.J.  
Dated: October 13, 2022  
New York, New York

**Re: Consent Request for Extension of Time for Defendants to Respond to the Second Amended Complaint in *Jacob v. Lorenz*, Case No. 1:21-cv-06807 (ER)**

Dear Judge Ramos:

We represent Defendants Taylor Lorenz and The New York Times Company (collectively, "Defendants") in the above-referenced action. We write to request an extension of time to respond to Plaintiffs Ariadna Jacob and Influences, Inc.'s ("Plaintiffs") Second Amended Complaint ("SAC") under Your Honor's Rule 1.E.

Plaintiffs filed their SAC on October 5, 2022. Dkt. No. 28. Pursuant to Fed. R. Civ. P. 15(a)(3), Defendants' answer or response to the SAC is currently due on October 19, 2022. Defendants seek a 30-day extension of time until November 18, 2022 to submit their answer or response to Plaintiffs' SAC. Defendants request this extension in light of conflicting pending deadlines and appellate argument on undersigned counsel's calendar.

This is Defendants' first request for an extension to respond to Plaintiffs' SAC. Defendants were previously granted a three-day extension on December 14, 2021 to respond to Plaintiffs' First Amended Complaint due to undersigned counsel's illness. Dkt. No. 15.

Plaintiffs' counsel has consented to this request.

Respectfully submitted,  
Davis Wright Tremain LLP



Katherine M. Bolger

cc: Counsel for Plaintiffs via ECF

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